

**EXHIBIT 21**

## MEMORANDUM

W. R. Starkey

DATE  
August 23, 1976

A. T. Curley

FROM

SUBJECT

Waste Chemical Disposal

REMARKS

cc: C. A. Aldag  
 W. Hobokan  
 C. E. Kwartler  
 J. Minott  
 J. Sigan  
 H. E. Sullivan

Following is an attempt to update all concerned on the status of the disposal of our waste chemicals. Since Kin-Buc (Gaess) was closed first to our spent acid and finally to all chemical wastes, we have been struggling to dispose of our wastes in a proper manner. After seeing our CDN unit shut down while we sought a home for our spent acid, we began using A.B.M. Disposal for our acid, while Gaess continued to take our other water wastes (not for the landfill).

Over the past few weeks I have had contacts with (1) A.B.M.'s Tieson and Barnhurst (2) Gaess' Santoro and (3) Gaess' ex-salesman John Leuzarder who is now part of a group who have formed Envirotech, a broker for waste disposal. Taking these singly, then:

- (1) A.B.M. has done little to bolster our confidence. Although their price is low, \$1,100 per load, I feel very uncomfortable having to depend on them. Both Santoro and Leuzarder have discovered that we are using A.B.M. and (as would be expected under the circumstances since both are actively seeking our acid business) have stated that A.B.M. is bad news and strongly questioned the legality of their methods. Santoro claims A.B.M. is storing the acid in a 30,000 gallon tank and looking all over the place (including Gaess) to dispose of the acid. What we have observed at our Plant and noted in our contacts with A.B.M. is conflicting. They have been dependable and some of their rigs are in excellent condition. However, some of the rigs are in poor shape. Their drivers seem poorly trained for handling truck loads of acid and initially had little feel for the safe handling of this material including little or no equipment. Efforts to get information on the ultimate destination of these loads have been evaded by Barnhouse and Tieson. We have not been able to get an invitation to inspect their facility.
- (2) Gaess' Santoro is strongly after our spent acid business. They recently took a test load. He visited the plant this past Thursday with the results of that test. He started off by (and this has been his tack on other occasions) hinting that the EPA, and presumably the NJDEP, are ready to seek out the illegal disposers they know are active in the absence of Kin-Buc and the generators who are using these "lizards" as he called them. He said he knows some big companies with their necks stuck out far and that they are going to get it. He wants us to avoid that pitfall.

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Being the good salesman that he is, he then went into his pitch. He said the test load went well and that they have a secret process which will dispose of the acid in a completely legal manner with no environmental problems. The "they" in this case may be Modern Transportation in Kearny with whom they have been working since the close of Kin-Buc. Incidentally, I asked about the future.

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of Kin-Buc since the newspaper reports of late seem to indicate very little chance for the new Kin-Buc II ever getting NJ-DEP approval. Santoro stated his doubts also and said for this reason Gaess was shifting in other directions, i.e. working with outfits like Modern and Chemical Recovery who have facilities for neutralization, barging, incinerating and sewerage materials.

Santoro indicated the cost would still be in the \$2,000 per load range. He further said they would need a commitment from Ashland since they need a capital investment of \$50,000 to get into operation on a plant scale. Presumably he is looking for a long range contract of some sort. I told him we were interested in settling our spent acid disposal problem but that the price was high. I also said we certainly would want to check out his system before any commitment was made. He countered by emphasizing the secret process and the possibility of our signing a secrecy agreement. He awaits an answer from us.

(3) I have been working with Leuzarder since he first came to the plant as a Gaess salesman a year ago. He has been very good to us, given us excellent service, has dealt completely above board and appears to be sincere in his efforts to handle wastes properly. Before Gaess let him go, he had expressed his discontent with the way Gaess was dumping thousands of gallons of all types of waste on the landfill with no attempt to "manage, mate, treat or swap wastes". This new group also includes Bob Landmesser who is also an ex-Gaess employee. Bob is also a very pleasant fellow. The point I am attempting to make is that I certainly know a lot more about them than I do about Tieson, Barnhurst or even Santoro.

Leuzarder and Landmesser are very anxious and enthusiastic about getting their new group off the ground. They say they have been received well by industry and have signed quite a few contracts with waste generating companies. They act as brokers, like Gaess, working with Modern, Chemical Recovery and others. They have quoted us prices and in general their prices are very slightly higher than Gaess. They want our acid account badly. They originally quoted \$1,450 but came down to \$1,275. We used them all this week and as of now I plan to stick with them. We are also switching some of our other wastes to them. Our spent acid is going to DeReal (This spelling could be wrong) in Philadelphia. According to Leuzarder, Ciba-Geigy is also using them for spent acid disposal. Here the acid is neutralized (in vessels) and the salt cake landfilled.

I called John today and asked if I could visit the facility and confirm the fact they are handling our acid in a proper manner. He hesitated a minute and then said the process was secret and that the outfit feared another disposal firm would steal their thunder. I got the impression that Leuzarder himself had not seen the process. Leuzarder called me back an hour or so later and said he could arrange a visit in a "couple weeks". This would give them time to "clean up a bit". He also mentioned the signing of a secrecy agreement.

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Tieson of A.B.M. called this week to see why we were not taking any acid. Dick DeWalk told him that we had another source of disposal. When he asked whether the price was better, Dick told him the major reason was that we had more confidence in the other outfit. Apparently Tieson will be up to see us again.

My feelings at this point lean towards staying with Leuzarder conditional with inspecting his outlet to convince ourselves of its legality. Meanwhile, we will have to hold Gaess at bay for awhile as this may turn out to be our only legal outlet. We can also see what A.B.M. will come back with now that they know we mean business on the legality issue. We certainly do not want to close any doors without good reason at this time.

ATC:aa

**EXHIBIT 22**

Manfred T. DeRewal, Sr.

May 9, 2003

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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

3 CIVIL ACTION NO.  
4 BOARHEAD FARM AGREEMENT 02-CV-3830  
GROUP, Judge Legrome D. Davis  
Plaintiff, Oral Deposition of

vs. MANFRED T. DE REWAL, SR.  
6 ADVANCED ENVIRONMENTAL TECHNOLOGY  
7 CORPORATION; ASHLAND CHEMICAL  
8 COMPANY; BOARHEAD CORPORATION;  
9 CARPENTER TECHNOLOGY CORPORATION;  
10 CROWN METRO, INC.; DIAZ CHEMICAL  
11 CORPORATION; EMHART INDUSTRIES,  
12 INC.; ETCHED CIRCUITS, INC.; FCG,  
13 INC.; GLOBE DISPOSAL COMPANY, INC.;  
14 GLOBE-WASTECH, INC.; HANDY & HARMAN  
15 TUBE COMPANY, INC.; KNOLL, INC.;  
16 MERIT METAL PRODUCTS CORPORATION;  
NOVARTIS CORPORATION; NRM INVESTMENT  
COMPANY; PLYMOUTH TUBE COMPANY;  
QUIKLINE DESIGN AND MANUFACTURING  
COMPANY; RAHNS SPECIALTY METALS,  
INC.; ROHM & HAAS COMPANY; SIMON  
WRECKING COMPANY, INC.; TECHALLOY  
COMPANY, INC.; THOMAS & BETTS  
CORPORATION; UNISYS CORPORATION;  
UNITED STATES OF AMERICA  
DEPARTMENT OF NAVY,  
Defendants.

Enviado: May 8, 2003

May, May 5, 2000

19  
20 Transcript in the above matter taken at  
21 the offices of Ballard, Spahr, Andrews & Ingersoll,  
LLP, 1735 Market Street, 42nd Floor, Philadelphia,  
Pennsylvania, commencing at 10 o'clock A.M.

22 Certified Shorthand Reporting Services  
23 Arranged Through  
24 Mastroianni & Formaroli, Inc.  
25 709 White Horse Pike  
Audubon, New Jersey 08106  
(856) 546-1100

	Page 402	Page 404
1 APPEARANCES:		
2 BALLARD, SPAHR, ANDREWS & INGERSOLL, LLP		
3 BY: GLENN A. HARRIS, ESQUIRE		
4 PLAZA 1000, MAIN STREET, # 500		
5 VOORHEES, NEW JERSEY 08043		
6 (856)761-3400		
7 ATTORNEYS FOR THE PLAINTIFF		
8		
9 WOLFF & SAMSON, PC		
10 BY: THOMAS W. SABINO, ESQUIRE		
11 THE OFFICES AT CRYSTAL LAKE		
12 ONE BOLAND DRIVE		
13 WEST ORANGE, NEW JERSEY 07052-3698		
14 (973)530-2044		
15 ATTORNEYS FOR THE DEFENDANT,		
16 ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION		
17 PHELAN, PETTIT & BIEDRZYCKI, ESQUIRES		
18 BY: DAVID M. DOTO, ESQUIRE		
19 NORTH AMERICAN BUILDING		
20 121 SOUTH BROAD STREET, SUITE 1600		
21 PHILADELPHIA, PENNSYLVANIA 19107		
22 (215)546-0500		
23 ATTORNEYS FOR THE DEFENDANT,		
24 ASHLAND CHEMICAL COMPANY		
25		
1 APPEARANCES (CONTINUED):	Page 403	Page 405
2 DUANE MORRIS		
3 BY: A. NICOLE FRIANT, ESQUIRE		
4 ONE LIBERTY PLACE		
5 PHILADELPHIA, PENNSYLVANIA 19103-7396		
6 (215)979-1818		
7 ATTORNEYS FOR THE DEFENDANT,		
8 FLEXIBLE CIRCUITS		
9 CARELLA, BYRNE, BAIN, GILFILLAN, CECCHI,		
10 STEWART & OLSTEIN, PC		
11 BY: G. GLENNON TROUBLEFIELD, ESQUIRE		
12 6 BECKER FARM ROAD		
13 ROSELAND, NEW JERSEY 07068-1739		
14 (973)994-1700		
15 ATTORNEYS FOR THE DEFENDANT,		
16 HANDY & HARMAN TUBE COMPANY, INC.		
17 MC NEES, WALLACE & NURICK, LLC		
18 BY: RICHARD H. FRIEDMAN, ESQUIRE		
19 100 PINE STREET		
20 HARRISBURG, PENNSYLVANIA 17108-1166		
21 (717)237-5469		
22 ATTORNEYS FOR THE DEFENDANT, KNOLL, INC.		
23 MORGAN, LEWIS & BOKIUS, LLP		
24 BY: MICHAEL R. DILLON, ESQUIRE		
25 1701 MARKET STREET		
26 PHILADELPHIA, PENNSYLVANIA 19103-2921		
27 (215)963-4938		
28 ATTORNEYS FOR THE DEFENDANT,		
29 NOVARTIS CORPORATION		
30 HENDERSON, WETHERILL, OHEY & HORSEY, ESQUIRES		
31 BY: EDWARD FACKENTHAL, ESQUIRE		
32 ONE MONTGOMERY PLAZA, SUITE 902		
33 NORRISTOWN, PENNSYLVANIA 19404		
34 (610)279-3370		
35 ATTORNEYS FOR THE DEFENDANT,		
36 NRM INVESTMENT COMPANY		
37 SCHMIDT & TOMLINSON, ESQUIRES		
38 BY: JULIE A. WILLIAMSON, ESQUIRE		
39 29 UNION STREET		
40 MEDFORD, NEW JERSEY 08055		
41 (609)714-0600		
42 ATTORNEYS FOR THE DEFENDANT,		
43 QUICKLINE DESIGN AND MANUFACTURING COMPANY		
44		
45		

2 (Pages 402 to 405)

Manfred T. DeRewal, Sr.

May 9, 2003

<p style="text-align: right;">Page 494</p> <p>1 to decompose whatever we're looking for. It's a  2 standard decomposition, sulfuric acid or nitric acid  3 or a mixture of nitric and hydrochloric acid. You  4 know, if you want to analyze something, you start to  5 dissolve something, usually you start off with nitric  6 hydrochloric. They call it aqua regis. It means it  7 dissolves everything except gold.</p> <p>8 Q. How often would you use sulfuric acid?</p> <p>9 A. What.</p> <p>10 Q. How often would you use sulfuric acid in  11 your lab?</p> <p>12 A. Oh, I don't know. We would --  13 depending, I think I was separating out a by-product,  14 the platinum group metals, and I was using sulfuric  15 acid there to get in the solution. I was looking for  16 platinum.</p> <p>17 Q. And when did you do that work?</p> <p>18 A. Sometime in the '70s. I had some  19 material coming out of California, and they were  20 wondering whether we could recover it.</p> <p>21 Q. Is it fair to say you did that type of  22 work fairly regularly?</p> <p>23 A. Yeah. If I'm not fishing, I do.</p> <p>24 Q. Okay. How about nitric acid, how often  25 did you use nitric acid?</p>	<p style="text-align: right;">Page 496</p> <p>1 nitric acids that you used in your lab?</p> <p>2 A. Well, probably I have a container there  3 with lime in it or caustic in it, and you usually,  4 you usually have in your waste solution in a  5 laboratory, you usually have as much caustic as you  6 do acid, so one just neutralizes each other. By the  7 time that container is full, when you test it, it's  8 neutral, you know. It doesn't take much of one or  9 the other to bring it to neutral.</p> <p>10 Q. What would you do with that container of  11 solution?</p> <p>12 MR. HARRIS: Objection.</p> <p>13 A. Probably drop it right down my septic  14 tank.</p> <p>15 Q. All right. Mr. DeRewal, I'm going to  16 change gears a minute. I want to talk to you a  17 little bit about some of the communications you had  18 with Ashland representatives.</p> <p>19 Do you recall ever inviting or  20 soliciting anyone from Ashland to dispose of waste at  21 Boarhead Farms?</p> <p>22 A. As I recall, somebody from Ashland did  23 come to Boarhead Farms, yes.</p> <p>24 Q. Okay. That's not my question, sir.</p> <p>25 My question is, did you ever invite or</p>
<p style="text-align: right;">Page 495</p> <p>1 A. Well, you know, you use it in a  2 laboratory. You're constantly using small quantities  3 of it, you know.</p> <p>4 Q. Is it fair to say you used nitric acid  5 fairly regularly in the lab?</p> <p>6 A. I think I usually have a gallon jug of  7 each acid, and I don't know how frequently I buy it,  8 but we keep about a gallon to do -- for experimental  9 use.</p> <p>10 Q. Where did you purchase the sulfuric and  11 nitric acids that you used do you recall?</p> <p>12 A. Usually small quantities. I usually buy  13 them from Arthur H. Thomas Company. They were a  14 chemical supplier.</p> <p>15 Q. Where was Arthur H. Thomas located?</p> <p>16 A. I don't know. They're over here in  17 Jersey somewhere. They used to be in Philadelphia,  18 and I just call them up, and they UPS it to me.</p> <p>19 Q. When you were ordering from them, were  20 they in Philadelphia or in New Jersey?</p> <p>21 A. I believe the last time I ordered  22 something from them, they were over here in New  23 Jersey. They're south of Camden somewhere down  24 there, I forget, down near Vineland somewhere.</p> <p>25 Q. How did you dispose of the sulfuric and</p>	<p style="text-align: right;">Page 497</p> <p>1 ask anyone from Ashland to dispose of their waste at  2 your property at Boarhead Farms?</p> <p>3 A. No.</p> <p>4 Q. I think you mentioned earlier that the  5 disposal of Ashland's waste was brokered by AETC; is  6 that right?</p> <p>7 A. Right.</p> <p>8 Q. And were all of DeRewal's billings for  9 the disposal of Ashland's waste directed to AETC?</p> <p>10 A. Yes.</p> <p>11 Q. So it's fair to say that you never  12 billed Ashland directly for the disposal of its  13 waste?</p> <p>14 A. That's correct.</p> <p>15 Q. Are you aware of anyone ever telling  16 anyone from Ashland that DeRewal or ECC would dispose  17 of Ashland's waste on your property at Boarhead  18 Farms?</p> <p>19 A. No, I don't think anyone ever told  20 Ashland's that.</p> <p>21 Q. Are you aware of anyone that worked for  22 DeRewal or ECC ever telling AETC that Ashland's waste  23 would be disposed of at Boarhead Farms?</p> <p>24 A. Yes.</p> <p>25 Q. Who told --</p>

25 (Pages 494 to 497)

<p style="text-align: right;">Page 498</p> <p>1 A. I told them.    2 Q. -- AETC that?    3 A. I told AETC that.    4 Q. Who did you tell at AETC?    5 A. I forgot the name of the principals,    6 Lazarus, I forgot the name of the principals.    7 Lazarus, John Lazarus, I believe it was.    8 Q. Who else was present when you told him    9 that?    10 A. Two partners.    11 Q. Anyone else?    12 A. I think their attorney Veracci. What's    13 his name, Veracci?    14 Q. Let's back up a minute. I want to make    15 sure we clarify the time frame here.    16 When you say you told them that    17 Ashland's waste was going to be disposed of at    18 Boarhead Farms, were you talking about in relation to    19 that lawsuit?    20 A. Yes.    21 Q. Okay. No, I'm not at that point, Mr.    22 DeRewal. Let's back up.    23 At the time when you were doing    24 business with AETC for the disposal of Ashland's    25 waste --</p>	<p style="text-align: right;">Page 500</p> <p>1 disposing of it at anyplace. I don't think so in    2 writing.    3 Q. I understand that you didn't. I'm    4 asking you why you didn't.    5 A. It wasn't requested. Nobody asked me.    6 Q. Mr. DeRewal, are you aware that Boarhead    7 Corporation has been named as a defendant in this    8 lawsuit?    9 A. Yes.    10 Q. To your knowledge, have they been served    11 with a complaint in this matter?    12 A. Yes.    13 Q. Have you consulted any counsel with    14 regard to this lawsuit on behalf of Boarhead    15 Corporation?    16 A. Yes.    17 Q. Who did you consult with?    18 A. Bob Shusterman.    19 Q. Is he representing Boarhead Corporation    20 in this lawsuit?    21 A. Not yet.    22 Q. Do you know whether he intends to?    23 A. Only if he gets paid. I don't get much    24 pro bono. I used to tell people that. That's what I    25 told -- one time I told the U.S. Attorney, that Chuck</p>
<p style="text-align: right;">Page 499</p> <p>1 A. Right.    2 Q. -- did you represent to anyone at AETC    3 that Ashland's wastes were going to be disposed of at    4 Boarhead Farms?    5 A. Some of it, yes, to the same -- one or    6 the other of the two principals. I forgot which one.    7 Q. Is it your recollection that you told    8 them that from the inception of your business    9 relationship?    10 A. Yes, and I know them by sight. I just    11 don't recognize their names. It's been too long.    12 Q. Did you confirm that in writing    13 anywhere?    14 A. Did I confirm it? No.    15 Q. Why not?    16 A. Did I confirm it?    17 Q. Yes.    18 A. No. Why would I confirm that?    19 Q. I'm asking you, did you ever confirm it?    20 MR. HARRIS: Objection.    21 A. I said no.    22 Q. Why not?    23 A. Why not?    24 Q. Yes.    25 A. I don't think I confirmed where I was</p>	<p style="text-align: right;">Page 501</p> <p>1 Peruto who was doing this pro bono. Nobody believed    2 me. You know, you got to give me a break sometime.    3 Q. Okay. Mr. DeRewal, why did you choose    4 to appear today in the last few days without counsel?    5 A. Do I need one? If I thought I needed    6 counsel, I would have one. I don't know why I need    7 one.    8 Q. Did you consult Mr. Shusterman or    9 anybody else before you appeared today?    10 MR. HARRIS: Objection. I don't    11 represent the witness, but that    12 certainly is asking for an    13 attorney-client privilege conversation.    14 I don't think it's proper.    15 MR. DOTO: Asking whether he    16 consulted with an attorney is a    17 privileged conversation?    18 MR. HARRIS: It might be.    19 MR. DOTO: Fine.    20 BY MR. DOTO:    21 Q. You can answer the question.    22 A. Shusterman said he wasn't invited, and I    23 said, Well, who is going to invite you? I said, I    24 can't invite you because you'll send me a bill. I    25 talked to him last week about this, but Bob</p>

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<p>1 present at that trial?</p> <p>2 A. No.</p> <p>3 Q. Was anybody from --</p> <p>4 A. Linda Cochran.</p> <p>5 Q. Linda Cochran was at that trial?</p> <p>6 A. Right.</p> <p>7 Q. Did she testify at that trial?</p> <p>8 A. I don't think so. I don't think so. I think the only people that testified besides myself were -- John Landmesser is his name. He's one of the principals.</p> <p>12 Q. Is this the name that you couldn't remember yesterday?</p> <p>14 A. Right, isn't it something like that, Landmesser?</p> <p>16 Q. Yes.</p> <p>17 A. Okay.</p> <p>18 Q. You get a bonus prize.</p> <p>19 Why was Linda Cochran present at the trial when she wasn't testifying?</p> <p>21 A. I think she's the one who obtained the lawyer for the case. I'm sure. I didn't know this lawyer that represented me. I met him the day of the trial. I mean --</p> <p>25 Q. Was Linda Cochran present for that whole</p>	<p>1 A. No.</p> <p>2 Q. -- a written transcript of that trial?</p> <p>3 A. No.</p> <p>4 Q. Do you remember if in that lawsuit that we're talking about, if AETC filed a countersuit, a counterclaim against DeRewal Chemical?</p> <p>7 A. I don't know. I don't know if they did or not.</p> <p>9 Q. I just have a few questions, I want to change subjects now with respect to the testimony that you gave this morning to Mr. Doto regarding the conversation that you had with AETC's principals in which you related this morning that you told them that Ashland's waste was going to be disposed of at the Boarhead Farm site.</p> <p>16 Do you remember that testimony?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Were one or both of AETC's principals, Mr. Landmesser and Mr. Lazarus, were they both present during that conversation?</p> <p>21 A. I believe so. It happened at Boarhead.</p> <p>22 Q. Okay. Was anybody else present during that conversation besides you and these other two gentlemen?</p> <p>25 A. Linda Cochran. I think she was there</p>
Page 531	Page 533
<p>1 trial?</p> <p>2 A. Yes.</p> <p>3 Q. Aside from Mr. Landmesser, was there --</p> <p>4 Mr. Landmesser and AETC's lawyer, was there anybody else from AETC at that trial?</p> <p>6 A. There was four other attorneys. I don't know who they represented. In this case, I don't know who they represented.</p> <p>9 Q. Okay. But my question was, aside from Mr. Landmesser and AETC's lawyer, was there anybody else AETC who was present at that trial?</p> <p>12 A. I don't know whether the other partner, Lazarus is it, was there or not. I don't really remember, but I know there was some other attorneys there, and I don't know who they'd be representing.</p> <p>16 They weren't representing me, so I don't know what companies they were representing.</p> <p>18 Q. Do you know if a written transcript of that trial was created?</p> <p>20 A. No, I do not know, but I assume it's not, they have it recorded, don't they?</p> <p>22 Q. I'm just asking you if you know as we're sitting here today.</p> <p>24 A. I don't know that.</p> <p>25 Q. Have you ever seen --</p>	<p>1 while we were talking.</p> <p>2 Q. Anybody else?</p> <p>3 A. There may have been, but I can't recall.</p> <p>4 Q. Okay. Was anybody from Ashland present --</p> <p>6 A. No.</p> <p>7 Q. -- during that conversation?</p> <p>8 A. No.</p> <p>9 Q. Was anybody from Diaz Chemical present?</p> <p>10 A. No.</p> <p>11 Q. All right. I just want you to take a look at the date on P-47, which is the invoices. I'll help you out here. It's the invoices to AETC, and it's March and April of 1977.</p> <p>15 A. Okay.</p> <p>16 Q. Do you see those dates?</p> <p>17 A. Uh-huh.</p> <p>18 Q. March and April of '77.</p> <p>19 Did this conversation at the Boarhead Farms when Mr. Landmesser and Mr. Lazarus and Linda Cochran was present when you said where Ashland's waste was going to be disposed of, did it happen before those dates in those invoices?</p> <p>24 A. I can only guess that --</p> <p>25 Q. That's fine.</p>

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1 A. I can only guess. It was warm.  
2 Q. It was warm?  
3 A. Oh, it happened after this.  
4 Q. Okay. Thanks.  
5 A. Because Mr. Lazarus had brought a rifle  
6 which he wanted to zero in on the property.  
7 Q. Okay. Thank you very much. I have no  
8 further questions?  
9 A. All I recall, he had a contest with  
10 Linda Cochran, and she was the better shot.  
11 (CONTINUED EXAMINATION OF MR. DE REWAL, SR. BY MR.  
12 HARRIS:  
13 Q. The conversation you were just asked  
14 about with Landmesser and Lazarus or whatever his  
15 name is, did DeRewal Chemical continue to take  
16 Ashland's waste after that conversation took place?  
17 A. Oh, yes.  
18 Q. All right. I don't have anything  
19 further?  
20 MR. SABINO: Thank you.  
21 (Testimony concluded.)  
22  
23  
24  
25

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1 CERTIFICATE  
2 I, NORA M. GALLAGHER, a Notary Public and  
3 Certified Shorthand Reporter of the State of New  
4 Jersey, and Commissioner of Deeds of the Commonwealth  
5 of Pennsylvania, do hereby certify that prior to the  
6 commencement of the examination,  
7 MANFRED T. DE REWAL, SR.  
8 Was duly sworn by me to testify to the truth, the  
9 whole truth and nothing but the truth.  
10 I do further certify that the foregoing  
11 is a true and accurate transcript of the testimony as  
12 taken stenographically by and before me at the time,  
13 place and on the date hereinbefore set forth.  
14 I do further certify that I am neither  
15 a relative nor employee nor attorney nor counsel of  
16 any of the parties to this action, and that I am  
17 neither a relative nor employee of such attorney or  
18 counsel and that I am not financially interested in  
19 this action.  
20  
21  
22 Nora M. Gallagher, C.S.R.  
My Commission Expires October 24, 2007  
23 Certificate No. XJ00911  
Date:  
24  
25

35 (Pages 534 to 535)

C E R T I F I C A T E

2 I, NORA M. GALLAGHER, a Notary Public and  
3 Certified Shorthand Reporter of the State of New  
4 Jersey, and Commissioner of Deeds of the Commonwealth  
5 of Pennsylvania, do hereby certify that prior to the  
6 commencement of the examination,

7 MANFRED T. DE REWAL, SR.

8 Was duly sworn by me to testify to the truth, the  
9 whole truth and nothing but the truth.

10 I do further certify that the foregoing  
11 is a true and accurate transcript of the testimony as  
12 taken stenographically by and before me at the time,  
13 place and on the date hereinbefore set forth.

14 I do further certify that I am neither  
15 a relative nor employee nor attorney nor counsel of  
16 any of the parties to this action, and that I am  
17 neither a relative nor employee of such attorney or  
18 counsel and that I am not financially interested in  
19 this action.

Helen M. Gallagher

22                   Nora M. Gallagher, C.S.R.  
23                   My Commission Expires October 24, 2007  
23                   Certificate No. XI00911  
23                   Date: 5/16/13

25

**EXHIBIT 23**

Linda J. Cochran

May 15, 2003

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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

----- CIVIL ACTION NO.  
BOARHEAD FARM AGREEMENT GROUP, 02-CV-3830  
Plaintiff, JUDGE LEGROME D. DAVIS  
Deposition of:  
vs. LINDA J. COCHRAN

7 ADVANCED ENVIRONMENTAL TECHNOLOGY  
8 CORPORATION; ASHLAND CHEMICAL  
9 COMPANY; BOARHEAD CORPORATION;  
10 CARPENTER TECHNOLOGY CORPORATION;  
11 CROWN METRO, INC., DIAZ CHEMICAL  
12 CORPORATION; EMHART INDUSTRIES,  
13 INC.; ETCHED CIRCUITS, INC.;  
14 FCG INC.; GLOBE DISPOSAL COMPANY,  
15 INC., GLOBE-WASTECH, INC.; HANDY &  
16 HARMAN TUBE COMPANY, INC.; KNOLL,  
17 INC.; MERIT METAL PRODUCTS  
CORPORATION; NOVARTIS CORPORATION;  
NRM INVESTMENT COMPANY; PLYMOUTH  
TUBE COMPANY; QUIKLINE DESIGN AND  
MANUFACTURING COMPANY; RAHNS SPECIALTY  
METALS, INC.; ROHM & HASS COMPANY,  
SIMON WRECKING COMPANY, INC.;  
TECHALLOY COMPANY, INC.; THOMAS &  
BETTS CORPORATION; UNISYS CORPORATION;  
UNITED STATES OF AMERICA DEPARTMENT OF NAVY;  
Defendants.

May 15, 2003

20 TRANSCRIPT in the above matter taken at the  
offices of BALLARD, SPAHR, ANDREWS & INGERSOLL,  
21 ESQUIRES, 1735 Market Street, 42nd Floor,  
Philadelphia, Pennsylvania, 19103, commencing at  
22 10:00 a.m.

23 CERTIFIED SHORTHAND REPORTING SERVICES  
Arranged Through  
24 MASTROIANNI & FORMAROLI, INC.  
709 White Horse Pike  
25 Audubon, New Jersey 08106  
(856) 546-1100

MFCSRS@aol.com

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(856) 546-1100

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<p style="text-align: right;">Page 74</p> <p>1 A. Yes.</p> <p>2 Q. Did you ever hear the name of a company 3 called Advanced Environmental Corporation?</p> <p>4 A. Yes.</p> <p>5 Q. What circumstances have you heard that 6 name?</p> <p>7 A. It was a company that two guys had over 8 in New Jersey someplace, I can't remember where, and 9 I mean they had a company that had to produce waste 10 or something because Fred did business with them, 11 they were one of the companies that he did business 12 with. And the reason I remember them better than any 13 of the other ones is those two guys came over to the 14 farm.</p> <p>15 Q. Okay. And who did you --</p> <p>16 A. A lot of the other companies, I never 17 saw anything except in an invoice.</p> <p>18 Q. Okay.</p> <p>19 A. Whereas these two, there were some of 20 them that came over, but these two guys came over to 21 the farm.</p> <p>22 Q. Okay. You saw them?</p> <p>23 A. Yes.</p> <p>24 Q. Did you meet them?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 76</p> <p>1 A. Yeah, they talked about business. But 2 again, you know, I wasn't really privy to the 3 business end of it. I mean, that wasn't -- you know, 4 just looking at it from a practical standpoint, if 5 Fred was going to talk to them about hauling waste, 6 it's not something he'd want to do in front of you or 7 me or anybody else unless he absolutely had to.</p> <p>8 Q. Did you in any of the conversations -- 9 back up. Strike it.</p> <p>10 On the occasion when the two people 11 from Advanced Environmental visited the site, did you 12 ever hear Mr. DeRewal discuss with them where he was 13 going to dump any of the waste that they were 14 associated with?</p> <p>15 A. I don't think so.</p> <p>16 Q. Would you take a look, please, at a 17 document that's been previously marked as Exhibit 18 P-45, and I'm going to ask you if you recognize any 19 of the handwriting on that document.</p> <p>20 MR. DILLON: For the record, can you 21 state what P-45 is?</p> <p>22 MR. HARRIS: It's a handwritten note.</p> <p>23 MR. DILLON: That's fine.</p> <p>24 THE WITNESS: My guess is that this is 25 Fred's handwriting.</p>
<p style="text-align: right;">Page 75</p> <p>1 Q. Do you remember their names?</p> <p>2 A. The tall one and the heavy set guy, John 3 and Bob, and they both had last names with L's, like 4 Lucwiski (ph), Lasouras (ph), I can't remember the 5 other one.</p> <p>6 Q. On how many occasions did you meet with 7 either or both of these folks?</p> <p>8 A. They both came over to the farm, and I 9 can only guess it was somewhere around hunting season 10 because I know we were shooting rifles.</p> <p>11 Q. Okay.</p> <p>12 A. And that's the only time I really 13 remember. You know, I don't know whether -- it seems 14 to me we went out, we went to get something to eat, 15 but whether it was the same day or whether that was 16 another time, I'm not really sure.</p> <p>17 Q. Okay. You have a specific recollection, 18 though, of one visit with the two of them?</p> <p>19 A. Yes.</p> <p>20 Q. And guns?</p> <p>21 A. Yes.</p> <p>22 Q. Did you observe, the one visit that 23 we're talking about, did you have occasion to observe 24 any conversation between the two Advanced 25 Environmental folks and Fred DeRewal about business?</p>	<p style="text-align: right;">Page 77</p> <p>1 BY MR. HARRIS:</p> <p>2 Q. It's not yours?</p> <p>3 A. No.</p> <p>4 Q. Okay. Did you ever see any truck, other 5 than trucks that you believed to be associated with 6 Fred's business, bring waste to the Boarhead site?</p> <p>7 A. The tankers are very hard to tell. But 8 I mean, I kind of knew the ones that I saw all the 9 time. There could have been other tankers that were 10 brought in there. I mean, somebody could have 11 switched the tanker, taken one of Fred's and brought 12 another one back, and I'm not so sure I would have 13 really recognized it. I mean, they were all kind of 14 the same color and they didn't have big letters on 15 the side that said DeRewal, other than just me kind 16 of remembering what they looked like, but they do all 17 look very much alike. Drums, the only specific time 18 I remember anybody else's drums or anything coming in 19 there were from Marvin Jonas.</p> <p>20 Q. Tell us what recollections you have 21 about Marvin Jonas' drums?</p> <p>22 A. Marvin is very much the same, I knew who 23 Marvin was. When he came in, he came in a little bit 24 before or a little bit after some of the drums and 25 the truck came in. He didn't stand there and say</p>

20 (Pages 74 to 77)

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1 MR. HARRIS: MR. HARRIS: Thank you for  
 2 your time today, Ms. Cochran. You're free to leave.  
 3 May I suggest nobody leave yet so we  
 4 can talk about a couple of things after the witness  
 5 leaves.

6 (Deposition Concludes.)

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1 **CERTIFICATE**

2  
 3 I, LISA MARCUS, a Notary Public, RPR, and  
 4 Certified Shorthand Reporter of the State of New  
 5 Jersey, do hereby certify that prior to the  
 6 commencement of the examination, LINDA COCHRAN, was  
 7 duly sworn by me to testify the truth, the whole  
 8 truth, and nothing but the truth.

9 I DO FURTHER CERTIFY that the foregoing is a  
 10 true and accurate transcript of the testimony as  
 11 taken stenographically by and before me at the time,  
 12 place, and on the date hereinbefore set forth, to the  
 13 best of my ability.

14 I DO FURTHER CERTIFY that I am neither a  
 15 relative nor employee nor attorney nor counsel of any  
 16 of the parties to this action, and that I am neither  
 17 a relative nor employee of such attorney or counsel,  
 18 and that I am not financially interested in the  
 19 action.

20  
 21

LISA MARCUS, C.S.R.  
 22 Notary Public, State of New Jersey  
 23 My Commission Expires November 17, 2004  
 24 Certificate No. XI01492  
 25 Date: May 30, 2003

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**EXHIBIT 24**

ADVANCED ENVIRONMENTAL TECHNOLOGY CORP., INC.  
"THE ENVIROTECH CO."

P. O. Box 152 • Milltown, New Jersey 08850 • (201) 238-0020

ORIGINAL  
(Reg)

September 9, 1976

Mr. Fred DeRewal  
DeRewal Chemical Co.  
Box 58  
Revere, Pa.

Dear Fred,

Confirming ours 9/9/76 - your prices to us -

- 1) Diamond Shamrock - Carlstadt  
Still Bottoms 65% H<sub>2</sub>O (Ph. 11) 35% dissolved solids  
including -  
Na<sub>2</sub>SO<sub>4</sub> (largest amount)  
Naphthalene sulfonated polymers  
other sulfonated materials  
some diatomaceous earth  
small amount CaSO<sub>4</sub>  
Trace Phenol

Your price to truck/dispose for Envirotech -----8¢/gallon.  
(about 5000 gal./week)

- 2) Roche - Belvidere  
67-75% H<sub>2</sub>O (by wt.)  
24-32% sodium sulfate  
0.4% Chlorides  
0.5% Carbon  
(about 2 to 10 loads per week at 5500 gal. each)

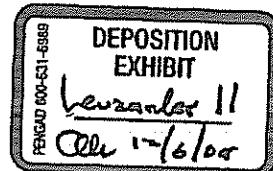
Trucks must be clean and neat in appearance.  
Roche will be told materials is going to Grows  
Landfill (can it - or at least part?) and lime  
make-up.

Your price to Envirotech for trucking/disposal -----6¢/gallon.  
(5500 gal. minimum load)

No pumps required on either account.

Sincerely  
  
John Leuzader  
Technical Service Rep.

Lander P.U.C. License #7011R-61  
I.E.P. #N.J.B.S.W.M. 02456003



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